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August 13, 2002

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-B204
Washington, D.C. 20554

*Re: Application of Qwest Communications International, Inc.
To Provide In-Region InterLATA Services in the States of Colorado,
Idaho, Iowa, Nebraska and North Dakota, WC Docket No. 02-148*

*Application of Qwest Communications International, Inc.
To Provide In-Region InterLATA Services in the States of Montana,
Utah, Washington & Wyoming, WC Docket No. 02-189*

Dear Ms. Dortch:

The staff of the Wireline Competition Bureau has requested that Qwest:

- 1) Describe why lack of telephone number (TN) migration and migration without specifying end-state features does not impede CLECs' ability to compete. Provide citations to LSOC and other filed documents.
- 2) Provide the scope and circumstances around which multiple LSRs are sent to CLECs.
- 3) Briefly describe the status of the 2 related WorldCom CRs.

RESPONSE:

When Qwest first implemented IMA EDI and the IMA GUI, conversions "as specified" did not require specification of the existing features that would not remain – the CLEC was required to specify only the features that would remain after the conversion was completed. However, CLECs and Qwest experienced significant problems. CLECs would not always pull the CSR to see what was on the account, and Qwest received a significant number of contacts to the Repair Center because features were discontinued. As a result, concurrent with release IMA 6.0 in February 2001, Qwest changed the process and required CLECs to identify what would happen to each feature during a conversion as specified.

The evidence demonstrates that this process is not impeding CLECs' ability to submit LSRs. For example, for the month of June, Qwest processed 9,799 LSRs migrating accounts as specified to UNE-P POTS. Additionally, if CLECs develop interfaces that are

integrated between pre-order and order, the features from the CSR should be automatically populated into the LSR, and the CLEC representative can indicate which features to retain with very little effort.

Further, CLECs did not submit a CR to change this process until June 7, 2002, when SCR060702-01 (Migrating Customers Using the Conversion As Specified Activity Type) was submitted. Qwest has determined that this CR can be implemented in two phases. The first phase can be implemented under the CMP guidelines for a Level 1 process change. The first phase would eliminate the process requirement for a UNE-P conversion-as-specified LSR to identify those features from the existing account that the CLEC does not want on the new account. Qwest will provide the notice and implement on 08/15/02. The second phase of the CR is to no longer require the LSR to differentiate between features that are being retained from the existing account and features that are being added as part of the conversion. This change does require CLEC system changes and must be disclosed for implementation in an IMA release. This CR has been prioritized as number two on the priority list for IMA 12.0 implementation.

A related CLEC CR, SCR061302-01 (Migrate UNE-P Customers By TN), was prioritized as number nineteen on the priority list for the IMA 12.0 implementation. Both of these CRs are subject to the following CMP steps:

The next step in the CMP calls for Qwest to define business and functional specifications. The specifications are completed on a per CR basis, in priority order. During this phase, any CRs that have affinities and may be more efficiently implemented together will be discussed with the CLECs. CRs with affinities are defined as CRs with similarities in functions or software components. Qwest will also present any complexities, changes in CR size, or other concerns that may arise during this phase that would impact the implementation of a CR. During this phase, CRs may be modified or new CRs may be added with a request that the CRs be considered for addition to the release candidate list. To include a new or modified CR at this point requires approval by the CMP participants.

At the conclusion of business and system requirements, Qwest will present packaging options (if more than one option is available) for implementing the release CRs. Packaging options are defined as different combinations of CRs proposed for continuing through the next phase of development.

Options may be identified due to affinities in candidates, or resource constraints that prevent some CRs from being implemented but allow others to be completed. If more than one option is available, a vote will be taken. The option with the largest number of votes will continue through the design phase of the development cycle. The discussion regarding packaging options for the IMA 12.0 Release is planned for November 21, 2002.

After design, Qwest will present a final list of CRs that can be implemented. These CRs become the committed CRs for the release. The discussion regarding committed CRs is planned for December 19, 2002.

IMA 12.0 is scheduled for April 7, 2003 implementation. The Exception Process, specified in Section 16 of the CMP, provides the ability for a CLEC or Qwest to request a deviation from the CMP. This process could be used to request expedited treatment or implementation outside of the normal planned release. However, no CLEC has requested that either of these CRs be worked as an exception and implemented prior to the IMA 12.0 Release.

CLECs also claim that the return of multiple CSRs during pre-order makes Qwest's practice of requiring all features even more difficult. While it is true that there are circumstances where IMA will return multiple CSRs for a CLEC to select from, this occurrence is limited¹ and does not impede CLECs from being able to submit a complete and accurate conversion LSR.

When a CLEC requests a CSR based on a 10-digit telephone number, IMA searches Qwest's billing systems (BOSS or CARS depending on region) for matches to the telephone number. When Qwest finds the telephone number on more than one account, it looks at the status and type of accounts involved to determine if it can isolate the correct CSR to return to the CLEC.

Accounts can contain one of three statuses:

- Live: The account is active
- Final: The account has been disconnected and a final bill has been rendered
- Blank: This occurs on recently established accounts that have not been through a bill cycle

IMA returns multiple CSRs when it encounters more than one account in "live" status. This occurs when a telephone number has experienced a change in billing recently (i.e., a change in bill responsibility between retail customers, a consolidation/deconsolidation of accounts, or a change in local service providers). The old account remains in live status until the final bill has been rendered.

Since this scenario is limited in duration to the period of time between the change occurring and the next bill date, the opportunity to encounter this circumstance is also limited. However, when encountered, the CLEC can review the two accounts to determine

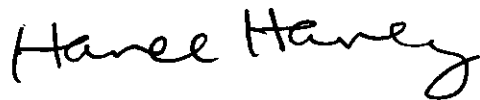
¹ Qwest analyzed how often multiple CSRs were returned in response to a CSR request between July 1, 2002, and August 4, 2002. Multiple CSRs were returned on 3.1% of the requests through IMA 10.0 (EDI and GUI combined), on 4.8% of the requests through IMA EDI 9.0, and on 5.0% of the requests through IMA EDI 8.0.

which is the most current. Once the CLEC has selected the actual live account, the process is the same.

In summary, Qwest is not impeding any CLEC's ability to compete as Qwest continues to process these types of orders while encouraging CLECs to utilize the integration steps and at the same time, work on implementing upcoming process modifications through the CMP process.

The twenty-page limit does not apply as set forth in DA 02-1390 and DA 02-1666.

Sincerely,

A handwritten signature in cursive script that reads "Hance Haney".

cc: M. Carowitz
E. Yockus
G. Remondino
M. Cohen
R. Harsch
J. Jewel
P. Baker
C. Post
P. Fahn
B. Smith
J. Myles
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